

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO**

UNITED STATES OF AMERICA,)	
)	CASE NO.: <u>1:18-cr-455</u>
Plaintiff,)	
)	JUDGE PEARSON
v.)	
)	SENTENCING MEMORANDUM
AARON MATTHEWS)	MOTION FOR RECOMMENDATION
)	
Defendant.)	

After his indictment, AARON MATTHEWS reviewed his case, discussed his options, and entered a timely plea of guilty. There was no evidence that AARON MATTHEWS impeded or obstructed justice. PSR, ¶12. AARON MATTHEWS accepted responsibility. PSR, ¶13.

AARON MATTHEWS was close to his five children. Prior to his arrest, he saw his children frequently and was a part of their lives. PSR, ¶ 49.

A review of the indictment, Plea agreement and the PSR, shows that AARON MATTHEWS made a decision, early in his life, that sent him down a terrible path. Once one starts down the path of illegal drugs, it is difficult, if not impossible, to turn around. AARON MATTHEWS became a victim of his own decisions.

AARON admits using and selling illegal drugs and being addicted. PSR, ¶ 53.

AARON has been personally abusing drugs since 1994. Id.

AARON does have a high school diploma and he earned a HVAC certification from the Ohio Business College in Sheffield, Ohio. PSR, ¶ 55.

AARON is at a stage in his life where he has time that he can right his wrongs and prepare for a new life after prison. AARON'S acceptance and "turn around" has been noticed by the Government.

The Government, knowing that the guideline range in this case, according to the PSR, is 121-151 months, stated "[t]he government has no objection to a sentence of 120 months." Plea Agreement, ¶ 16; PSR ¶ 61. The Government has no objection that the Defendant be sentenced to the mandatory minimum.

Having a high school diploma and a certificate in HVAC, AARON MATTHEWS has already investigated the training possibilities in the Bureau of Prisons. AARON MATTHEWS understands that although it is the Bureau of Prison's decision where he is placed, the Bureau of Prisons will listen to and will consider what the Court recommends.

AARON MATTHEWS moves the Court for a recommendation to the Bureau of Prisons send to him to an institution where he can be further trained in HVAC and other skills for construction of homes or businesses.

The DEFENDANT has reviewed Milan, Michigan because that facility has the programs that the DEFENDANT so desperately needs.

The DEFENDANT also moves that this Court recommend that AARON MATTHEWS be placed in the 500 hour drug program. AARON MATTHEWS needs help to control his drug addiction.

Because he has accepted responsibility and made plans to become a productive citizen, a sentence of 120 months, the mandatory minimum, would be a proper sentence in this case.

Respectfully submitted,

/s/Joseph W.Gardner
JOSEPH W. GARDNER #0033400
4280 Boardman-Canfield Road
Canfield, Ohio 44406
Phone: (330) 533-1118
Fax: (330) 533-1025
JWG1118@gmail.com
Attorney for Defendant

CERTIFICATION

I hereby certify that on April 23, 2019, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular US mail. Parties may access this filing through the Court's system.

/s/Joseph W. Gardner

JOSEPH W. GARDNER #0033400

Attorney for Defendant